

Clayeo C. Arnold, Esq., SBN 65070
John T. Stralen, Esq., SBN 171227
CLAYEO C. ARNOLD
A PROFESSIONAL LAW CORPORATION
865 Howe Avenue
Sacramento, CA 95825
Telephone: (916) 777-7777
Facsimile: (916) 924-1829
Email: jstralen@justice4you.com

Attorneys for Plaintiff MONICA RANGER individually and
on behalf of those similarly situated

Natalie B. Fujikawa, Esq., SBN 258724
GORDON REES SCULLY MANSUKHANI, LLP
3 Parkcenter Drive, Ste. 200
Sacramento, CA 95825
Telephone: (916) 565-2900
Facsimile: (916) 920-4402
Email: nfujikawa@grsm.com

Attorneys for Defendant SHARED IMAGING, LLC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MONICA RANGER, individually and on
behalf of all those similarly situated,

PLAINTIFF,

vs.

SHARED IMAGING, a Limited Liability
Company and DOES 1 THROUGH 100,
inclusive,

Defendants.

Case No.: 2:20-cv-00401-KJM-KJN

JOINT STIPULATION AND ORDER
GRANTING PLAINTIFF LEAVE TO FILE
SECOND AMENDED COMPLAINT

WHEREAS, on January 1, 2020, Plaintiff MONICA RANGER (“Plaintiff”) filed a
Class Action Complaint in Sacramento County Superior Court, asserting the following six causes
of action against Defendant SHARED IMAGING, LLC (“Defendant”): (1) failure to pay

1 compensation for forfeited meal periods; (2) failure to pay compensation for forfeited rest
2 periods; (3) failure to pay overtime wages; (4) failure to provide accurate pay stubs; (5) failure
3 to pay timely earned wages during employment and upon separation of employment; and (6)
4 violation of Business and Professions Code sections 17200, *et seq.*;

5 **WHEREAS**, on February 21, 2020, Defendant filed a Notice of Removal to the United
6 States District Court for the Eastern District of California;

7 **WHEREAS**, on April 23, 2020, Plaintiff filed a First Amended Class Action Complaint,
8 removing Plaintiff's claim for failure to timely pay wages, and adding a claim for penalties
9 pursuant to the California Private Attorneys General Act;

10 **WHEREAS**, Plaintiff seeks to file a Second Amended Complaint to add a cause of action
11 for Failure to Indemnify/Reimburse Business Expenses in violation of Labor Code section 2802;

12 **WHEREAS**, a copy of Plaintiff's proposed Second Amended Complaint for Damages
13 is attached hereto as **Exhibit "A"**;

14 **IT IS HEREBY STIPULATED**, by and between Plaintiff and Defendant, by and
15 through their respective counsel, that:

16 1. Plaintiff should be granted leave to amend to file the Second Amended Complaint
17 for Damages, a copy of which is attached hereto as **Exhibit "A."**

18 2. Defendant's responsive pleading shall be due thirty (30) days after the Second
19 Amended Complaint for Damages is filed.

20
21 Dated: March 26, 2021

THE DARREN GUEZ LAW FIRM

22
23 /s/ Darren Guez

Darren Guez, Esq.
Attorney for Plaintiff Doug Stewart

24
25 Dated: March 26, 2021

GORDON & REES SCULLY MANSUKHANI

26
27 /s/ Natalie B. Fujikawa

Natalie B. Fujikawa, Esq.
Attorney for Defendant Shared Imaging, LLC

ORDER

IT IS HEREBY ORDERED that the foregoing stipulation is approved and the Clerk is directed to accept the Second Amended Complaint for filing forthwith.

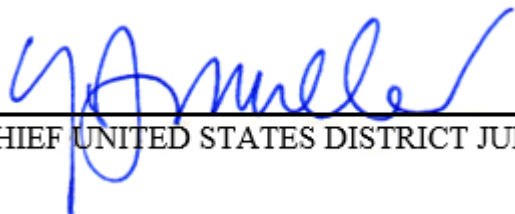
The Court having reviewed the foregoing Stipulation, and good cause appearing therefore:

IT IS HEREBY ORDERED that Plaintiff, MONICA RANGER is granted leave to amend to file her Second Amended Complaint for Damages, a copy of which is attached hereto as **Exhibit "A."**

IT IS ALSO ORDERED that Defendant's responsive pleading shall be due thirty (30) days after the Second Amended Complaint for Damages is filed.

IT IS FURTHER ORDERED that the Second Amended Complaint for Damages is deemed filed as of the date this Order is transmitted via the CM/ECF system.

DATED: March 30, 2021.



CHIEF UNITED STATES DISTRICT JUDGE